

Roddrick Newhouse, Trustee
401 Century Parkway
Suite 715
Allen, TX 75013
Telephone: (469) 777-6560
Email: rn7trustee@gmail.com

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
SAN ANGELO DIVISION**

IN RE:	§	
	§	
ROTO, INC.,	§	CASE NO. 22-60072-RLJ7
	§	
Debtor.	§	Chapter 7
	§	

**MOTION TO RE-OPEN CHAPTER 7 CASE
PURSUANT TO 11 U.S.C. §350 AND BANKRUPTCY RULE 5010**

ANY PARTY WISHING TO RESPOND TO THIS PLEADING MUST FILE THE RESPONSE WITH THE U.S. BANKRUPTCY CLERK, GEORGE MAHON FEDERAL BUILDING, 1205 TEXAS AVENUE, ROOM 306, LUBBOCK, TX 79401-4002, WITHIN 21 DAYS OF THE SERVICE OF THIS PLEADING. IF A RESPONSE IS FILED AND SERVED TIMELY, A HEARING ON THE RESPONSE WILL BE SCHEDULED WITH A NOTICE TO THE RESPONDING PARTY ONLY.

IF NO RESPONSE IS FILED AND TIMELY SERVED ON THE TRUSTEE, THE COURT MAY DEEM THE RELIEF REQUESTED UNOPPOSED AND MAY ENTER AN ORDER GRANTING THE RELIEF REQUESTED WITHOUT FURTHER NOTICE TO ANY PARTY.

TO THE HONORABLE RONALD L. JONES, U. S. BANKRUPTCY JUDGE:

Roddrick Newhouse, Trustee, files this Motion to Reopen Pursuant to 11 U.S.C. §350 and Bankruptcy Rule 5010 and in support respectfully shows the Court the following:

1. **ROTO, INC.,** Debtor, filed its voluntary petition for relief under Chapter 7 of the Bankruptcy Code on December 28, 2022. Roddrick Newhouse was appointed Interim Trustee of the bankruptcy estate.

2. The Trustee's Report of No Distribution was filed on April 26, 2023 and trustee was

discharged and the case was closed on May 30, 2023.

3. The Interim Trustee has received funds in connection with a refund from Ford Credit listed on bankruptcy schedules.

4. The former Trustee, Roddrick Newhouse, believes the case should be re-opened to allow the trustee to administer the assets.

5. The former Trustee requests the U.S. Trustee to appoint a trustee to administer the case and the property.

6. The assets in this case constitute cause under 11 U.S.C. §350 to reopen this case.

FOR THESE REASONS, Roddrick Newhouse, Trustee prays that this Court enter an Order:

- Reopening this case;
- Directing the U.S. Trustee to appoint a Chapter 7 trustee; and
- Granting any other relief this Court deems appropriate.

Respectfully submitted,

By: /s/ Roddrick Newhouse
Roddrick Newhouse
CHAPTER 7 TRUSTEE
401 Century Parkway
Suite 715
Telephone: (469) 777-6560
Email: rn7trustee@gmail.com

CERTIFICATE OF SERVICE

I, Roddrick Newhouse, certify that a true and correct copy of the ***MOTION TO RE-OPEN CHAPTER 7 CASE PURSUANT TO 11 U.S.C. §350 AND BANKRUPTCY RULE 5010*** was forwarded by electronic transmission or first class mail, postage prepaid, to the United States Trustee, 1100 Commerce Street, Room 976, Dallas, TX 75242, and to the parties included on the attached Service List, on this 24th day of July 2023.

/s/ Roddrick Newhouse
Roddrick Newhouse, Trustee

Northern District of Texas

San Angelo

Mon Jul 24 08:49:23 CDT 2023

(p)FORD MOTOR CREDIT COMPANY

P O BOX 62180

COLORADO SPRINGS CO 80962-2180

(p)DEERE CREDIT SERVICES INC

ATTN LITIGATION & RECOVERY DEPARTMENT

PO BOX 6600

JOHNSTON IA 50131-6600

Roto, Inc.

3135 Executive Dr.

San Angelo, TX 76904-6801

Tom Green CAD

Linebarger Goggan Blair & Sampson, LLP

c/o Sherrel K. Knighton

2777 N. Stemmons Freeway

Suite 1000

Dallas, TX 75207-2328

350th District Court

300 Oak St., Ste. 404

Abilene, TX 79602-1534

U.S. Bank National Association

14841 Dallas Parkway, Suite 425

Dallas, TX 75254-8067

306 Federal Building

1205 Texas Avenue

Lubbock, TX 79401-4037

AMEX

P.O. Box 981537

El Paso, TX 79998-1537

AT&T

P.O. Box 6463

Carol Stream, IL 60197-6463

Airgas
2929 N. Bryant Blvd.
San Angelo, TX 76903-2362Airgas USA, LLC
110 West 7th Street, Suite 1300
Tulsa, OK 74119-1106Allen Young Office Machines
60 N. Chadbourne
San Angelo, TX 76903-5849Ally
Payment Processing Center
P.O. Box 9001948
Louisville, KY 40290-1948Ally Bank
AIS Portfolio Services, LLC
4515 N Santa Fe Ave. Dept. APS
Oklahoma City, OK 73118-7901Angelo Plumbing Supply
2500 N. Bryant Blvd.
San Angelo, TX 76903-2868Antraquip Corporation
758 Bowman Ave.
Hagerstown, MD 21740-6809Aramark/Ameripride Services
2680 Palumbo Dr.
Lexington, KY 40509-1234B & W Trailer
P.O. Box 5277
San Angelo, TX 76902-5277BenMark Supply Company
P.O. Box 198
Midland, TX 79702-0198Bill Williams Tire Center
P.O. Box 1772
Midland, TX 79702-1772Bitco
P.O. Box 933370
Atlanta, GA 31193-3370Boley-Featherston Ins.
P.O. Box 97513
Whichita Falls, TX 76307-7513Bridgestone Hose Power
50 Industrial Loop North
Orange Park, FL 32073-6258CAN-DOO Budget Rentals
301 Goliad Dr.
Abiene, TX 79601-6246Capital One
P.O. Box 60519
City of Industry, CA 91716-0519Chrysler Capital
P.O. Box 660335
Dallas, TX 75266-0335City of San Angelo
P.O. Box 5820
San Angelo, TX 76902-5820

Dean & Linebarger

305 W. Twohig

San Angelo, TX 76903-6319

E&R Supply Co.

1717 S. Chadbourne

San Angelo, TX 76903-8596

Ed Cheatle

2726 Oak Mountain Trail

San Angelo, TX 76904-7417

Fenix Capital Funding, LLC

9265 4th Ave., 2nd Floor

Brooklyn, NY 11209-7006

First National Bank & Trust Co.

First Bank Texas

1100 E Main St

Weatherford, OK 73096-5799

First National Bank & Trust Co.

First Bank Texas

1849 South 1st

Abilene, TX 79602-1107

First National Bank & Trust Co.

First Bank Texas

P.O. Box 968

Baird, TX 79504-0968

FleetPride

P.O. Box 847118

Dallas, TX 75284-7118

Ford Credit

P.O. Box 650575

Dallas, TX 75265-0575

Gas Card

P.O. Box 51140

Midland, TX 79710-1140

HUBER Technology

1009 Airlie Parkway

Denver, NC 28037-7705

Hargraves Tire & Auto

1617 Pulliam St.

San Angelo, TX 76905-5111

Hay, Wittenburg, Davis, Caldwell, & Bale

Attn: Larry W. Bale

P.O. Box 271

San Angelo, TX 76902-0271

John Deer Financial

P.O. Box 650215

Dallas, TX 75265-0215

John Voller

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Abilene, TX 79605-3823

Kings County Supreme Court

360 Adams St #4

Brooklyn, NY 11201-3749

LG Funding LLC

1218 Union Street.

Brooklyn, NY 11225-1512

McCoys Building Supply

P.O. Box 1362

San Marcus, TX 78667-1362

Mercedez-Benz Financial

P.O. Box 685

Roanoke, TX 76262-0685

Miller Ag Service & Supply

P.O. Box 625

Eden, TX 76837-0625

Optimum Business

1111 Stewart Ave.

Bethpage, NY 11714-3533

Phillips and Associates, CPA's

2709 81st St., Ste. A

Lubbock, TX 79423-2225

Precision Pump Systems

P.O. Box 73149

Houston, TX 77273-3149

QFS Capital Funding

110 E Broward Blvd.

Fort Lauderdale, FL 33301-3503

Rendall Sikes PLLC

Attn: Celena Adcock

5310 Harvest Hill Rd., Ste. 260

Dallas, TX 75230-5811

SKG Engineering

1122 S. Bryant

San Angelo, TX 76903

Texas Mutual

P.O. Box 841843

Dallas, TX 75284-1843

(p)US BANK PO BOX 5229 CINCINNATI OH 45201-5229	United States Trustee 1100 Commerce Street Room 976 Dallas, TX 75242-0996	Velocity 290 Broadhollow Rd. Melville, NY 11747-4836						
Vulcan Materials P.O. Box 849131 Dallas, TX 75284-9131	WTGF WTG Fuels P.O. Box 3514 Midland, TX 79702-3514	Wells Fargo 420 Montgomery St. San Francisco, CA 94104-1298						
West TX Rock Resources, LLC P.O. Box 871 Roscoe, TX 79545-0871	Yellowhouse Machinery Co. P.O. Box 31388 Amarillo, TX 79120-1388	Roddrick Breon Newhouse 401 Century Pkwy Unit 715 Allen, TX 75013-8043						
<p>Ronald M. Mapel Ronald M. Mapel, Attorney at Law 3119 Cumberland Drive San Angelo, TX 76904-6110</p> <p>The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4) .</p> <table border="0"> <tr> <td>Ford Motor Credit Company LLC PO Box 62180 Colorado Springs, CO 80962</td> <td>John Deere Construction & Forestry Company P.O. Box 6600 Johnston, IA 50131</td> <td>(d)National Bankruptcy Service Center Ford Credit P.O. Box 62180 Colorado Springs, CO 80962</td> </tr> <tr> <td>US Bank P.O. Box 790179 St. Louis, MO 63179</td> <td>End of Label Matrix Mailable recipients 72 Bypassed recipients 0 Total 72</td> <td></td> </tr> </table>			Ford Motor Credit Company LLC PO Box 62180 Colorado Springs, CO 80962	John Deere Construction & Forestry Company P.O. Box 6600 Johnston, IA 50131	(d)National Bankruptcy Service Center Ford Credit P.O. Box 62180 Colorado Springs, CO 80962	US Bank P.O. Box 790179 St. Louis, MO 63179	End of Label Matrix Mailable recipients 72 Bypassed recipients 0 Total 72	
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